

I think this new band for the Wireless Broadband Industry is a great thing. I have concerns about the non-specified contention based systems. I do feel that there should be something put in place to keep a person/system from monopolizing the spectrum. I fear that since there is no standard for contention systems that there will be people who will get a system certified but also create a method maybe at the networking level to keep the radios alive in such a manor that they will completely occupy the spectrum and make it impossible for any other system to function. Since there are no standards a network operator could flood the network with ping tests or some other data to keep the radios alive while they are not actually moving desired traffic.

This is an unprecedented action by the FCC and while the intent is to help the small guys, the well-funded companies with staff of creative minds will find ways to exploit the rules and effectively push the small guy out of the picture. There is just too much at stake for them not to. With the possibility of content providers losing the last mile connectivity to the customers they will look at any was possible (wireless) to get that last mile connection. Companies such as AOL and MSN are well funded to do this and any possible loophole will be used to get back that last mile connection they need.

This new band is desperately needed and I fully support the action, I just think the safeguards need to be well thought out to prevent abuse. I have been in the wireless industry since 1989 and currently run an RF consulting service. History has a way of repeating itself, just with different technology. While I would hope the safeguards are put in to place, I would not want that process to slow down the release of this band to the operators who need the spectrum.

Thank you.